

1 DANIEL G. BOGDEN
2 United States Attorney
3 District of Nevada

4 DANIEL P. TALBERT
5 Special Assistant United States Attorney
6 Social Security Administration
7 160 Spear Street, Suite 800
8 San Francisco, CA 94105
9 Telephone: (415) 977-8995
10 Facsimile: (415) 977-8873
11 Attorneys for Defendant

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 TAMMY A. GILL,

15 Plaintiff,

16 v.

17 CAROLYN W. COLVIN,
18 Acting Commissioner of Social Security,

19 Defendant.

No. 2:15-cv-00553-JCM-CWH

STIPULATION AND PROPOSED ORDER FOR
EXTENSION

(THIRD REQUEST)

20 The parties request to extend the time by three days from December 14, 2015, to
21 December 17, 2015, for Defendant Carolyn W. Colvin, Acting Commissioner of Social Security
22 (the Commissioner), to file her Cross-Motion to Affirm. This is the Commissioner's third request
23 for an extension.

24 There is good cause for this extension. The Commissioner has previously requested and
25 received two extensions of time to file her responsive brief in this matter. Since the filing of
26 Plaintiff's motion, scheduling and workload commitments led to the assignment and reassignment
27 of this case to three different attorneys for the Commissioner. The undersigned attorney for the
28 Commissioner learned of this matter for the first time this morning, and agreed to accept
reassignment of the case, resolve the scheduling issue, and prepare and submit the

1 Commissioner's Motion to Affirm as promptly as possible. The undersigned attorney for the
2 Commissioner has made this matter his top priority and will attempt to file his Motion to Affirm
3 either today, December 15, 2015, or tomorrow, December 16, 2015, but at the latest by Thursday,
4 December 17, 2015. The undersigned attorney for the Commissioner apologizes to the Court and
5 to opposing counsel for making this additional request for additional time, and for the failure to
6 file the Motion to Affirm yesterday as required by this Court's prior order. Counsel for Plaintiff
7 does not oppose this request, and joins in this stipulation to grant the Commissioner a third
8 extension of three days.

9 Respectfully submitted,

10 DANIEL G. BOGDEN
11 United States Attorney

12 DATE: December 15, 2015

By s/ Daniel P. Talbert
13 DANIEL P. TALBERT
14 Special Assistant United States Attorney

15 Attorneys for Defendant

By s/ Marc V. Kalagian
16 MARC V. KALAGIAN
17 *by email authorization December 15, 2015

18 Attorney for Plaintiff

19
20 IT IS SO ORDERED.

21
22
23 DATE: December 16, 2015


24 THE HONORABLE C. W. HOFFMAN, JR.
25 United States Magistrate Judge
26
27
28